

# Exhibit M

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO**

**STACIE RAY, et al.**

Plaintiffs,

v.

**STEPHANIE MCCLOUD, Director,  
Ohio Department Health, et al.,**

Defendants.

Case No.: 2:18-cv-00272-MHW-CMV

Judge: Michael Watson  
Magistrate Judge: Chelsey Vascura

**DECLARATION OF EMMA KEESHIN**

Pursuant to 28 U.S.C. 1746

I, Emma Keeshin, declare under penalty of perjury that the following is true and correct to the best of my knowledge and belief:

1. I am above the age of 18, I am competent to testify, and I have personal knowledge of the matters contained in this declaration.
2. I was the Legal Assistant for the ACLU of Ohio between the years 2016 and 2018.
3. The ACLU of Ohio is a statewide non-profit organization that relies upon the contributions of its members and supporters, and in part upon attorney fees incurred in litigation, to fund its operations.
4. As the Legal Assistant, I performed investigations, managed client communications, and provided other support and paralegal work to the ACLU of Ohio's three-person (formerly two-person) attorney team.

5. I worked on the above-captioned case, including the pre-litigation investigation and during the litigation, until I left the department in 2018.
6. I have a bachelor's degree from Oberlin College, where I graduated in 2015 with degrees in politics and in law and society.
7. Currently, I work as a distributed organizer with Pennsylvania United, a labor rights organization that works to build solidarity between working-class people of different backgrounds in Western Pennsylvania.
8. My resume detailing my professional qualifications is attached to this Declaration as Exhibit M-1.
9. The hours I expended working on this case are attached to this Declaration as Exhibit M-2.
10. The time I expended and listed here is reasonable, and the records submitted are an accurate reflection of that time. I documented my time in six-minute increments.
11. I exercised billing judgment to prepare these time records. For example, I did not list time for many small tasks or for any tasks that did not take at least six minutes to complete.
12. I also did not list my time for the many clerical tasks I had to perform for this litigation, such as finalizing and filing motions and pleadings.
13. I also did not list the considerable time I expended on the pre-litigation investigation for this case, or the work I performed to prepare for filing the initial complaint.
14. The reasonable hourly rate for my work is \$150.

15. I am using a fair market rate for my time, as a legal assistant in this region with a bachelor's degree and multiple years of experience. I believe this rate reflects my level of skill and experience. These conclusions are based in part on the guidance published by the Ohio State Bar Association, attached to the Fee Petition in this case as Exhibit A.

16. The lodestar figure for my work on this case, determined by multiplying my reasonable hours expended by my reasonable rate, is  $8.7 * 150 = \$1,305$ .

Executed on this February 1, 2021

By: /s/ Emma Keeshin  
Emma Keeshin